

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Jose L. Linares
:
:
v. : Criminal No. 09-913
:
:
LORI SERRANO : PROTECTIVE ORDER BY CONSENT

This application having been opened to the Court by the United States (Paul J. Fishman, United States Attorney, by Maureen Nakly, Assistant U.S. Attorney, appearing) under Rule 16(d)(1) of the Federal Rules of Criminal Procedure for a protective order limiting disclosure of protected materials that will be provided to defense counsel pursuant to the Court's standing discovery, which may include (a) recorded conversations of defendant and others; (b) wire and electronic communications intercepted pursuant to 18 U.S.C. § 2510 et seq.; (c) transcripts of recorded conversations and intercepted communications; (d) investigative agency reports; (e) e-mail correspondence; (f) SMS text message correspondence; (g) testimonial and non-testimonial transcripts (h) search warrant materials; (i) plea materials and (j) affidavits (collectively, the "Protected Materials"); and

For good cause shown; and


The parties having consented:

IT IS on this 7th day of January, 2010,

ORDERED that:

1. The Protected Materials shall not be disclosed to anyone other than defendant, defendant's counsel and/or any agent working at the direction of defense counsel in this matter;
2. The Protected Materials only will be used in the preparation of the defense in this case and notwithstanding the provisions of Paragraph 1, the defense shall be permitted to review, with prospective witnesses and their counsel, all materials referenced in Paragraph 1 to the extent necessary to prepare the defense;
3. Notwithstanding any other provision, the defense shall be permitted to disclose any materials provided in Paragraph 1 in connection with the filing of the defendant's motions with the Court, or for use at trial; and

4. If there is a need prior to trial or during trial to disclose the Protected Materials beyond that permitted by this Order, then the defendant will make an application to the Court, upon notice to the government, requesting authorization.


HONORABLE JOSE L. LINARES
UNITED STATES DISTRICT JUDGE

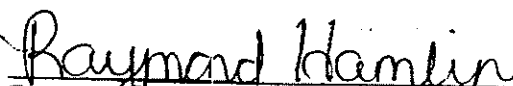
Accepted and Acknowledged:

UNITED STATES ATTORNEY
PAUL J. FISHMAN

BY:


MAUREEN NAKLY
Assistant U.S. Attorney

DEFENDANT LORI SERRANO
(by her counsel)


Terry Ridley, Esq.
Raymond Hamlin, Esq.